

AMENDMENT UNDER 37 C.F.R. § 1.111  
U.S. APPLN. NO. 10/787,392

**REMARKS**

Applicant respectfully requests the Examiner to reconsider and withdraw the claim objections in view of the above clarifying amendments made to several claims, which amendments now recite that the "stimulable phosphor sheet assembly" includes a "phosphor layer". Also, since the specification already makes it clear that the word "case" is the same as "cassette", Applicant has clarified the claim language to match the specification. The word "casing" has been replaced by the word "frame" where appropriate.

Claim 1 has been voluntarily canceled without prejudice, thereby rendering **moot** the rejection of claim 1 under 35 U.S.C. § 102(e) as being anticipated by Shoji '861.

Applicant respectfully traverses the rejection of claims 1-4, 8-10, 12 and 13 under 35 U.S.C. § 102(b) as being anticipated by Tamura '227 (**newly cited**). This rejection requires that Tamura disclose, either expressly or inherently, each limitation of each of claims 1-4, 8-10, 12 and 13, or in other words, that each of these claims be readable on Tamura's disclosure. Applicant respectfully submits that clearly such is **not** the case here.

First, Applicant notes that Tamura is assigned to the same assignee (Fuji Photo Film Co.) as the present application. As a preliminary matter, Applicant also respectfully suggests to the Examiner that the "Prior Art" illustrated in Applicant's Figs. 14 and 15 is the most relevant prior art against which the present claims should be measured.

These claims require, *inter alia*, that the sheet member of different material be mounted in the cassette, a requirement/limitation not found or suggested in Tamura. Furthermore, Tamara does not teach (or suggest) Applicant's claimed "stimulable phosphor sheet assembly" with

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"first" and "second" recesses, a "frame", etc. More specifically, Tamura provides a cassette (covers 1 and 2) and a stimulable phosphor sheet 6 received in the cassette. A stimulable phosphor layer 6a is overlaid on a substrate 6b of the stimulable phosphor sheet 6. In other words, Tamura merely discloses a structure in which a two-layered stimulable phosphor sheet 6 is removably housed in the cassette.

Therefore, since these rejected claims are **not readable** on Tamura's disclosure, Applicant respectfully submits that Tamura is **incapable of anticipating** these claims.

Thus, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection under 35 U.S.C. § 102(b).

Applicant also **traverses** the rejections of claims 14, 15, 16, 17, 18 and 7 under 35 U.S.C. § 103(a) based on unpatentability (obviousness) over Tamura (as a primary reference) in view of one or more secondary/tertiary references.

Applicant respectfully submits that the above analysis of Tamura shows that Tamura does not (notwithstanding the Examiner's assertion to the contrary) disclose, or even suggest, Applicant's claimed "radiation image-forming unit" as recited in the independent claim 7 and in the respective parent claims of the dependent claims 14-18. Furthermore, the disclosures of the secondary/tertiary references do not overcome the deficiency in the disclosure of the primary reference, Tamura '227.

That is, because of this deficiency, not only would there be no motivation to combine/modify Tamura with these secondary/tertiary references, but also, even if for some

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unknown reasons such a combination/modification were made, there would not be produced the subject matter of any of claims 14-18 and 7.

More specifically, even if (for some unknown reason) Tamura were modified by the cassette thickness of Sayed '832, and/or by the cassette markings and stacking of Walker '888, and/or by the double-sided tape of Shoji '861, and/or by the hinged lid (61, 62) of Wendlandt '390, there would not be produced the subject matter of any of claims 14-18 and 7, or subject matter which would have rendered these claims obvious.

Therefore, Applicant respectfully requests the Examiner to reconsider and withdraw all the rejections under 35 U.S.C. § 103(a).

By the above amendments, Applicant has attempted to overcome the "Claim Objections" specified by the Examiner, while at the same time clarifying the subject matter of the pending claims in such a way that the rejections under 35 U.S.C. § 102(e) and 103(a) do not apply to the subject matter of each of these claims.

**REQUEST FOR INTERVIEW**

However, since Applicant sincerely believes that Applicant's disclosure clearly contains subject matter which is both novel and patentable (non-obvious) over the applied prior art, Applicant respectfully requests the Examiner to **call the undersigned attorney** (if the Examiner feels that the application is not now in condition for allowance) to discuss any unresolved issues and to expedite the disposition of the application.

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Applicant hereby petitions for any extension of time which may be required to maintain the pendency of this application, and any required fee for such extension is to be charged to Deposit Account No. 19-4880. The Commissioner is also authorized to charge any additional fees under 37 C.F.R. § 1.16 and/or § 1.17 necessary to keep this application pending in the Patent and Trademark Office or credit any overpayment to said Deposit Account No. 19-4880.

Respectfully submitted,

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